

**IN THE UNITED STATES BANKRTUPCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

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IN RE:

Reagor-Dykes Motors, LP,  
Reagor-Dykes Imports, LP,  
Reagor-Dykes Amarillo, LP,  
Reagor-Dykes Auto Company, LP,  
Reagor-Dykes Plainview, LP, and  
Reagor-Dykes Floydada, LP,  
Reagor Auto Mall, Ltd.,  
Reagor-Dykes Snyder, L.P.,  
Reagor-Dykes Auto Mall I LLC,  
Reagor-Dykes II LLC,  
Reagor-Dykes III LLC,

Case No. 18-50214-rlj-11  
Jointly Administered

Debtors,

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Dennis Faulkner, Creditors' Trustee,

*Plaintiff,* Adversary No. 20-05005-rlj

vs.

Ford Motor Credit Company LLC,

*Defendant.*

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**DEFENDANT FORD MOTOR CREDIT COMPANY LLC'S MOTION FOR STAY AND  
ORDER STRIKING SCHEDULING ORDER DEADLINES OR, ALTERNATIVELY, AN  
ORDER REOPENING DISCOVERY AND STRIKING SCHEDULING ORDER  
DEADLINES**

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Defendant Ford Motor Credit Company LLC ("Ford Credit") hereby files its Motion for Stay and Order Striking the Deadlines in the Court's Current Scheduling Order or, in

the alternative, an Order Reopening Discovery and Striking the Current Scheduling Order Deadlines to accommodate discovery concerning the Trustee's badges of fraud and direct evidence theories of the Debtors' alleged fraudulent intent. Ford Credit is entitled to a stay pursuant to Federal Rule of Bankruptcy Procedure 8007 and an order striking the current Scheduling Order deadlines preserve Ford Credit's rights to fair notice and due process. Ford Credit's Motion should be granted for the reasons set forth in the brief filed in support of same. Ford Credit respectfully requests a hearing on its Motion for Stay and an Order Striking Scheduling Order Deadlines.

**PRAYER**

Ford Credit requests that the Court enter an Order staying this adversary proceeding pending Ford Credit's appeal and striking the Scheduling Order deadlines, or, alternatively, reopening discovery and striking the Scheduling Order deadlines. Ford Credit also requests such other and further relief to which it may be justly entitled.

Date: October 24, 2022

Respectfully submitted,

BAKER BOTTs L.L.P.

By: /s/ Kevin M. Sadler

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*ATTORNEYS FOR DEFENDANT  
FORD MOTOR CREDIT COMPANY LLC*

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Ford credit has conferred with counsel for the Creditors' Trustee regarding this Motion and that the Creditors' Trustee is opposed to the relief sought herein.

*/s/ Kevin M. Sadler* \_\_\_\_\_

Kevin M. Sadler

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2022, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to all parties through the Court's Electronic Case Filing System ("ECF"). Parties may access this filing through ECF.

*/s/ Kevin M. Sadler*

Kevin M. Sadler